

November 1, 2006

Thomas J. Spulak King & Spalding LLP 1700 Pennsylvania Avenue, NW Washington, DC 20006

RE: MUR 5789
Bacardı, Inc. PAC
Robert M. Higdon, Treasurer

Dear Mr. Spulak:

This is in response to your letter dated October 31, 2006, which we received on November 1, 2006, requesting a 20-day extension to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on or before December 4, 2006.

If you have any questions, please contact me on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,

Kim Collins, Paralegal

Complaints Examination and

Legal Administration